

## **EXHIBIT A**

SUPREME COURT OF THE CITY OF NEW YORK  
COUNTY OF NEW YORK

RONALD G. TAYLOR,

Plaintiff,

STARBUCKS CORPORATION

Defendant(s)

Index No. 100972-20

SUMMONS

Plaintiff designates New  
York County as the place  
of trial based on the  
Plaintiff residence.  
Plaintiff resides at 420  
West 19<sup>th</sup> Street New York,  
N.Y. 10011  
County New York

STATE OF NEW YORK )  
COUNTY OF NEW YORK )

TO THE ABOVE NAMED DEFENDANTS:

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff within 20 days after the service, where service is made by delivery upon you personally within 30 days after completion of service is made in any other manner. In case of failure to appear or answer, judgment will be taken against you by default for relief demanded in this complaint

Dated: New York, N.Y.  
October 28, 2020

RONALD G. TAYLOR,  
420 West 19th Street, 3-E  
New York, NY 10011

(212) 851-6247  
rtaylor10011@gmail.com

**FILED**  
OCT 28 2020

COUNTY CLERK'S OFFICE  
NEW YORK

**SUPREME COURT OF THE CITY OF NEW YORK  
COUNTY OF NEW YORK**

**RONALD G. TAYLOR,**

**Plaintiff,**

**vs.**

**STARBUCKS CORPORATION**

**Defendant**

**Index No.**

**COMPLAINT**

100972/20

**INTRODUCTION**

- 1) Plaintiff Ronald G. Taylor, Pro se ("Plaintiff") brings this action against STARBUCKS CORPORATION (collectively, "STARBUCKS") challenging "STARBUCKS" that it failed to properly instruct and regulate its security personnel; more particularly, its cashier that was working its cash register on October 13, 2020, at approximately 0945 Hrs. when Plaintiff Ronald G. Taylor, walked in to the STARBUCKS store located at 122 Greenwich Avenue New York, NY all within approximately ten (10) seconds of entering the STARBUCKS store was confronted by John Doe Cashier who acted as its Loss Prevention Security Guard observed nothing more than a black man listing to the left side and immediately came to the conclusion that Plaintiff Ronald G. Taylor, had STARBUCKS merchandise concealed under his trench coat.

### **JURISDICTION AND VENUE**

- 2) Plaintiff invokes this Court's pendant jurisdiction over any and all claims and causes of action which derive from the same nucleus of operative facts;
- 3) Venue is laid within the Supreme Court of the State of New York, County of New York as the incident arose in the City, County, and State of New York;
- 4) Plaintiff demands a trial by jury on each and every one of the claims as pleaded herein;

### **PARTIES**

- 5) At all relevant times herein Plaintiff Ronald G. Taylor was and still is a resident of the City, State, and County of New York;
- 6) At all times mentioned herein, the Defendant STARBUCKS CORPORATION, collectively, ("STARBUCKS"), was and still is a Foreign Business Corporation duly authorized and existing under and by virtue of the laws of the States of New York;
- 7) The causes of action herein alleged arose in the State of New York County of New York;
- 8) The conduct and complained of herein is without any culpable conduct on the part of the Plaintiff Ronald G. Taylor;

### **FACTUAL BACKGROUND**

- 9) Plaintiff Roald G. Taylor established a business relationship with the Defendant STARBUCKS CORPORATION ON October 20, 2013 under Account ID. 6096-3627-1643-5577, which remains in good standing to this date seven some (7) years later;

- 10) On October 13, 2020, Plaintiff Ronald G. Taylor had a medical procedure performed by his surgeon Dr. Peter McCann, which consisted of injecting cortisone into Plaintiff Ronald G. Taylor's left shoulder as a last resort to avoid surgery;
- 11) Dr. Peter McCann's office is located at 200 West 13<sup>th</sup> Street in New York City which is approximately a three (3) minute walk to the STARBUCKS location where the incident occurred;
- 12) The STARBUCKS store in question is located at 122 Greenwich Avenue New York, NY; once again, a three (3) minute walk from when the Plaintiff Ronald G. Taylor existed the office of Dr. Peter McCann;
- 13) Plaintiff Ronald G. Taylor has and still is a resident of the Chelsea community for thirty (30) years;
- 14) Plaintiff Ronald G. Taylor within approximately ten (10) seconds of entering the STARBUCKS store referenced herein at length, which is located in the Chelsea section of Manhattan was aggressively confronted by its John Doe Cashier and accused of having concealed STARBUCKS merchandise under the left side of his trench coat;
- 15) Plaintiff Ronald G. Taylor, was order by the John Doe STARBUCKS operative who apparently based on his actions was masquerading as a cashier but in all actuality must have been the Defendant's loss prevention operative or its security guard ordered the Plaintiff Ronald G. Taylor to disrobe and empty the content of his pockets on to the store counter;
- 16) Plaintiff Ronald G. Taylor, explained to the John Doe STARBUCKS operative that he could not comply with his direct orders as he just had a medical procedure performed

**less than ten (10) minutes ago on his left shoulder and is feeling the effects of therefrom;**

- 17) The Defendant's John Doe loss prevention operative and or its security guard became extremely boisterous, spoke in a scatological manner to the Plaintiff and stated "hurry up before I call the police and have your black ass locked up;**
- 18) Plaintiff Ronald G. Taylor, was forced to move with dispatch and as a result thereof caused him to contort his body in a manner which was detrimental;**
- 19) Plaintiff Ronald G. Taylor was overcome with pain and had to sit down inside of the STARBUCKS store;**
- 20) The Defendant's loss prevention operative or its security guard stated to the Plaintiff "get your black ass out of my store now;**
- 21) Plaintiff Ronald G. Taylor, was in excruciating pain and could not function properly from the pain; therefore; he placed a call to the corporate office of STARBUCKS @ 800-782-7282 and reported the incident.**

**FIRST CAUSE OF ACTION: RESPONDEAT SUPERIOR**

- 22) Plaintiff Ronald G. Taylor, repeats and realleges each and every allegation contained in paragraphs 1) through 21) as though fully set forth for the very first time;**
- 23) The acts and conduct of the Defendant STARBUCKS CORPORATION, which is set forth in the foregoing paragraphs constitute Respondent Superior defined in the CPLR § 1602 at length;**

**SECOND CAUSE OF ACTION: NEGLIGENCE**

24) Plaintiff Ronald G. Taylor, repeats and realleges each and every allegation contained in paragraphs 1) through 23) as though fully set forth for the very first time;

**THIRD CAUSE OF ACTION: PAIN AND SUFFERING**

25) Plaintiff Ronald G. Taylor, repeats and realleges each and every allegation contained in paragraphs 1) through 24) as though fully set forth for the very first time;

26) The acts and conduct of the Defendant STARBUCKS CORPORATION set forth in the foregoing paragraphs caused Plaintiff Ronald G. Taylor to endure unnecessary Pain and Suffering; in addition, exacerbated a tear in the Plaintiff's Rotator Cuff; CPLR § 4213;

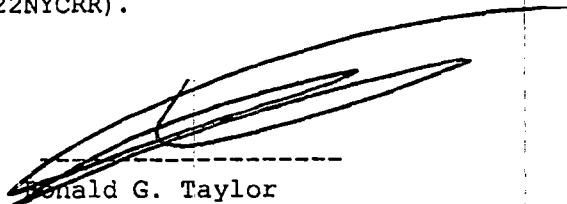
WHEREAS, Plaintiff Ronald G. Taylor, respectfully request that this Court:

- (a) Declare that the STARBUCKS CORPORATION is responsible for the actions perpetrated by its John Doe servant who is under the employ of Defendant STARBUCKS CORPORATION, Let the master answer
- (b) Order Punitive Damages in the amount of (\$250,000.00) TWO HUNDRED AND FIFTY THOUSAND DOLLARS;
- (c) Plaintiff Ronald G. Taylor, has not sought any other relief concerning this incident;
- (d) Grant any other relief that this Court deems to be just and proper;
- (e) Allow leave of the Court to Amend this Complaint should further damages be assessed.

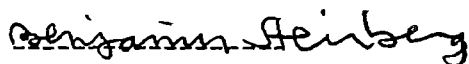
STATE OF NEW YORK )  
COUNTY OF NEW YORK )

Ver. Fraction

Plaintiff Ronald G. Taylor, being duly sworn deposes and says that we are the Plaintiff in the within action; I have read the Summons and Complaint and know the contents thereof; the contents of the facts are true to my knowledge, except for those matters therein stated to be alleged upon information and belief, and as to those matters, I believe to be true to the best of my knowledge, based on information and belief formed after an inquiry reasonable under the circumstances. The presentation of the paper or the contentions therein are not frivolous as defined in subsection © of section 130-1.1 of the Chief Administrator (22NYCRR).

  
\_\_\_\_\_  
Ronald G. Taylor

Subscribed and sworn to before me  
on 28<sup>th</sup> day of October, 2020

  
Notary Public

Benjamin Steinberg  
Notary Public, State of New York  
No. 02ST6042665  
Qualified in Bronx County  
Commission Expires May 30, 2022

**Dated this 27<sup>th</sup> day of August, 2020**

BY 

**Ronald G. Taylor**

**To: Prentice Hall as Registered Agent of STARBUCKS CORPORATION  
80 STATE ST  
ALBANY, NEW YORK, 12207**

SUPREME COURT OF THE CITY OF NEW YORK  
COUNTY OF NEW YORK

RONALD G. TAYLOR,

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VERIFIED COMPLAINT

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Plaintiff RONALD G. TAYLOR, Pro se

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Apartment 3-E  
New York, N.Y. 10011

212-851-6247

rtaylor10011@gmail.com